

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHASE WILLIAMS and WILLIAM ZHANG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-02809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND
LLC and JOHNNY HONG, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,
DANIEL LARIMER, IAN GRIGG, and
BROCK PIERCE,

Defendants.

Civ. No. 1:20-cv-03829-LAK

CLASS ACTION

JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING THE RESPONSE
TO THE AMENDED COMPLAINT
BY DEFENDANT BRENDAN
BLUMER

Plaintiff Crypto Assets Opportunity Fund (“Lead Plaintiff”), individually and on behalf of all others similarly situated, and Defendant Brendan Blumer (together, the “Stipulating Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on September 18, 2020, Lead Plaintiff filed an amended complaint (the “Amended Complaint”), Dkt. No. 66;

WHEREAS, on November 2, 2020, Defendants Block.One, Daniel Larimer, and Brock Pierce (the “Served Defendants”) filed a motion to dismiss the Amended Complaint (the “Motion to Dismiss”), Dkt. No. 85, which has been fully briefed and is currently pending;

WHEREAS, on February 22, 2021, the Court granted Lead Plaintiff's *ex parte* motion for alternative service of process, authorizing service of the Amended Complaint upon Mr. Blumer pursuant to Fed. R. Civ. P. 4(f) *nunc pro tunc*, Dkt. No. 106;

WHEREAS, if Mr. Blumer were to respond to the Amended Complaint at this time, in addition to raising those bases already set forth in the Motion to Dismiss, Mr. Blumer would assert one additional, independent basis (*i.e.*, lack of personal jurisdiction) in support of a motion to dismiss of the Amended Complaint;

WHEREAS, Lead Plaintiff would oppose any separate motion to dismiss by Mr. Blumer;

WHEREAS, to conserve the Court's and the Stipulating Parties' resources and to avoid unnecessary motion practice, the Stipulating Parties have agreed that it would serve the interests of judicial economy to adjourn Mr. Blumer's deadline to respond to the Amended Complaint, pending the Court's decision on the Motion to Dismiss.

NOW THEREFORE, IT IS STIPULATED AND AGREED by and between the undersigned counsel for the Stipulating Parties, subject to the Court's approval, as follows:

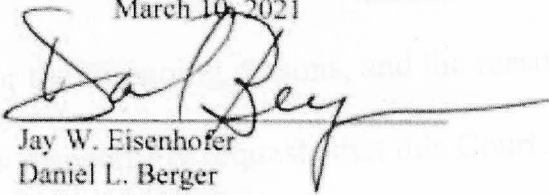
1. Mr. Blumer shall not be required to move to dismiss, answer, or otherwise respond to the Amended Complaint pending the Court's decision on the Motion to Dismiss;
2. Promptly upon the Court's decision on the Motion to Dismiss, the Stipulating Parties will meet and confer with respect to Mr. Blumer in light of the Court's decision on the Motion to Dismiss;
3. No later than ten (10) days after the Court's entry of its decision on the Motion to Dismiss, the Stipulating Parties will report to the Court on whether Lead Plaintiff intends to

proceed with its claims against Mr. Blumer and, if so, will propose a briefing schedule for a motion to dismiss the Amended Complaint on grounds that are specific to Mr. Blumer;

4. Should Mr. Blumer elect to make his own motion to dismiss the Amended Complaint, such motion shall be limited to a challenge to jurisdiction and/or any arguments advanced in the Motion to Dismiss;

5. Nothing in this stipulation shall prejudice the right of any party to seek further extensions on the consent of the other Stipulating Parties or from the Court.

Date: New York, NY
March 10, 2021



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*Lead Counsel for the Class and for Lead
Plaintiff Crypto Assets Opportunity Fund*

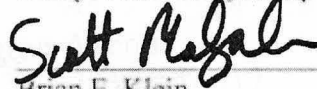
Attorneys for Plaintiffs

Respectfully submitted,



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*Attorneys for Defendants Block.one, Daniel
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SO ORDERED:

Dated: _____, 2021

Hon. Lewis A. Kaplan
United States District Judge